

UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA

April 2022 Grand Jury

UNITED STATES OF AMERICA,

Plaintiff,

v.

SALVADOR GONZALEZ,

Defendant.

ED CR No. **5:23-cr-00035-JGB**

I N D I C T M E N T

[26 U.S.C. § 7206(2): Aiding and  
Assisting in the Preparation of  
False Tax Returns]

The Grand Jury charges:

INTRODUCTORY ALLEGATIONS

At times relevant to this Indictment:

1. Defendant SALVADOR GONZALEZ was a resident of Corona,  
California.

2. Defendant GONZALEZ owned and operated a tax preparation  
business, Grace's Lighthouse Resources Center, Inc., through which he  
prepared tax returns for clients for a fee.

3. Grace's Lighthouse Resources Center, Inc., was located in  
Corona, California.

1           4.     The Internal Revenue Service ("IRS") was an agency of the  
2 United States Department of the Treasury responsible for  
3 administering and enforcing the tax laws of the United States.

4           5.     IRS Form 1040, U.S. Individual Income Tax Return ("Form  
5 1040"), was used by U.S. taxpayers to file an annual income tax  
6 return.

7           6.     Schedule A, Itemized Deductions ("Schedule A") was an IRS  
8 form that was attached to a Form 1040, when applicable, and used by  
9 taxpayers to claim certain permissible deductions from adjusted gross  
10 income. Deductions that could be claimed on a Schedule A included,  
11 among others, cash contributions to charity, medical and dental  
12 expenses, and unreimbursed employee expenses.

13           7.     Schedule E, Supplemental Income and Loss ("Schedule E") was  
14 an IRS form that was attached to a Form 1040, when applicable, and  
15 used by taxpayers to report income or loss generated from certain  
16 businesses, including those that elected to be an S Corporation.

17           8.     IRS Form 1120-S, U.S. Income Tax Return for an S  
18 Corporation ("Form 1120-S"), was used by certain businesses to file  
19 an annual income tax return.

20           9.     These Introductory Allegations are incorporated into all  
21 Counts of this Indictment.

## COUNTS ONE THROUGH TWENTY-FIVE

[26 U.S.C. § 7206(2)]

On or about the dates set forth below, in Riverside County, within the Central District of California, and elsewhere, defendant SALVADOR GONZALEZ willfully aided and assisted in, and procured, counseled, and advised, the preparation and presentation to the IRS of false and fraudulent U.S. Individual Income Tax Returns, Forms 1040, for the taxpayers and for the tax years set forth below. The Forms 1040 were false and fraudulent as to material matters in that they included: (1) false claims of Schedule E business losses in the amounts specified below, when defendant GONZALEZ then knew that the taxpayers had not incurred such business losses in the amounts stated on the Forms 1040; and (2) false claims of Schedule A deductions for the items and in the amounts specified below, when defendant GONZALEZ then knew that the taxpayers were not entitled to claim such deductions in the amounts stated on the Forms 1040.

COUNT	TAXPAYER(S)	APPROX. DATE FILED	TAX YEAR	FALSE ITEM(S)
ONE	A.P. & D.P.	04/15/2017	2016	1. Schedule E, Line 31, S Corporation loss of \$53,417 2. Schedule A, Line 16, Cash contributions of \$8,729 3. Schedule A, Line 21, Unreimbursed employee expenses of \$14,529

COUNT	TAXPAYER(S)	APPROX. DATE FILED	TAX YEAR	FALSE ITEM(S)
TWO	A.P. & D.P.	04/15/2018	2017	1. Schedule E, Line 31, S Corporation loss of \$68,986 2. Schedule A, Line 16, Cash contributions of \$8,843 3. Schedule A, Line 21, Unreimbursed employee expenses of \$15,941
THREE	A.P. & D.P.	04/15/2019	2018	1. Schedule E, Line 31, S Corporation loss of \$54,761 2. Schedule A, Line 11, Cash contributions of \$13,083
FOUR	D.F. & M.F.	04/15/2017	2016	1. Schedule E, Line 31, S Corporation loss of \$36,711 2. Schedule A, Line 21, Unreimbursed employee expenses of \$15,332
FIVE	D.F. & M.F.	06/10/2019	2017	1. Schedule E, Line 31, S Corporation loss of \$60,403 2. Schedule A, Line 16, Cash contributions of \$11,898 3. Schedule A, Line 21, Unreimbursed employee expenses of \$10,254
SIX	D.F. & M.F.	07/15/2020	2018	1. Schedule E, Line 31, S Corporation loss of \$51,082 2. Schedule A, Line 11, Cash contributions of \$38,800

COUNT	TAXPAYER(S)	APPROX. DATE FILED	TAX YEAR	FALSE ITEM(S)
SEVEN	D.F. & M.F.	09/22/2021	2019	Schedule E, Line 31, S Corporation loss of \$64,506
EIGHT	E.G.	08/10/2018	2017	1. Schedule A, Line 1, Medical and dental expenses of \$190,356 2. Schedule A, Line 16, Cash contributions of \$191,359 3. Schedule A, Line 23, Other expenses—investment, safe deposit box, etc., of \$30,930
NINE	M.K. & M.K.	12/14/2018	2017	Schedule A, Line 16, Cash contributions of \$65,302
TEN	M.K. & M.K.	03/17/2020	2018	Schedule A, Line 11, Cash contributions of \$55,774
ELEVEN	M.K. & M.K.	03/14/2022	2019	1. Schedule E, Line 31, S Corporation loss of \$22,435 2. Schedule A, Line 11, Cash contributions of \$173,933
TWELVE	M.M.	04/15/2017	2016	1. Schedule E, Line 31, S Corporation loss of \$32,093 2. Schedule A, Line 16, Cash contributions of \$30,355 3. Schedule A, Line 21, Unreimbursed employee expenses of \$16,338

COUNT	TAXPAYER (S)	APPROX. DATE FILED	TAX YEAR	FALSE ITEM(S)
THIRTEEN	M.M.	04/15/2018	2017	1. Schedule E, Line 31, S Corporation loss of \$46,792 2. Schedule A, Line 16, Cash contributions of \$10,494 3. Schedule A, Line 21, Unreimbursed employee expenses of \$13,139
FOURTEEN	M.M.	04/15/2019	2018	1. Schedule E, Line 31, S Corporation loss of \$34,221 2. Schedule A, Line 1, Medical and dental expenses of \$17,048 3. Schedule A, Line 11, Cash contributions of \$45,168
FIFTEEN	R.H. & J.H.	04/15/2017	2016	Schedule E, Line 31, S Corporation loss of \$33,901
SIXTEEN	R.H. & J.H.	04/15/2018	2017	Schedule E, Line 31, S Corporation loss of \$33,673
SEVENTEEN	R.H. & J.H.	04/15/2019	2018	Schedule E, Line 31, S Corporation loss of \$51,646
EIGHTEEN	R.H. & J.H.	04/15/2020	2019	Schedule E, Line 31, S Corporation loss of \$58,657
NINETEEN	T.C. & P.C.	04/13/2020	2018	1. Schedule E, Line 31, S Corporation loss of \$21,948 2. Schedule A, Line 11, Cash contributions of \$50,974

COUNT	TAXPAYER(S)	APPROX. DATE FILED	TAX YEAR	FALSE ITEM(S)
TWENTY	T.C. & P.C.	01/07/2021	2019	1. Schedule E, Line 31, S Corporation loss of \$128,200 2. Schedule A, Line 11, Cash contributions of \$36,334
TWENTY- ONE	T.C. & P.C.	08/26/2021	2020	1. Schedule E, Line 31, S Corporation loss of \$104,542 2. Schedule A, Line 11, Cash contributions of \$39,216
TWENTY- TWO	T.C. & P.C.	06/13/2022	2021	1. Schedule E, Line 31, S Corporation loss of \$124,506 2. Schedule A, Line 11, Cash contributions of \$55,372
TWENTY- THREE	V.C. & A.C.	04/06/2018	2016	1. Schedule E, Line 31, S Corporation loss of \$30,264 2. Schedule A, Line 16, Cash contributions of \$12,718 3. Schedule A, Line 21, Unreimbursed employee expenses of \$18,504
TWENTY- FOUR	V.C. & A.C.	04/15/2018	2017	1. Schedule E, Line 31, S Corporation loss of \$31,163 2. Schedule A, Line 16, Cash contributions of \$12,054 3. Schedule A, Line 21, Unreimbursed employee expenses of \$21,713

COUNT	TAXPAYER(S)	APPROX. DATE FILED	TAX YEAR	FALSE ITEM(S)
TWENTY- FIVE	V.C. & A.C.	04/15/2019	2018	1. Schedule E, Line 31, S Corporation loss of \$50,306 2. Schedule A, Line 1, Medical and dental expenses of \$15,153 3. Schedule A, Line 11, Cash contributions of \$18,231



## COUNTS TWENTY-SIX THROUGH FORTY-SEVEN

[26 U.S.C. § 7206(2)]

On or about the dates set forth below, in Riverside County, within the Central District of California, and elsewhere, defendant SALVADOR GONZALEZ willfully aided and assisted in, and procured, counseled, and advised, the preparation and presentation to the IRS of false and fraudulent U.S. Income Tax Returns for an S Corporation, Forms 1120-S, for the businesses and for the tax years set forth below. The Forms 1120-S were false and fraudulent as to material matters in that they included false claims that the businesses had incurred business losses in the amounts specified below, when defendant GONZALEZ then knew that the businesses had not incurred such business losses in the amounts stated on the Forms 1120-S.


COUNT	BUSINESS (TAXPAYER)	APPROX. DATE FILED	TAX YEAR	FALSE ITEM
TWENTY-SIX	Above and Beyond Thinking, Inc. (T.C.)	04/21/2019	2018	Line 21, Business loss of \$21,948
TWENTY-SEVEN	Above and Beyond Thinking, Inc. (T.C.)	07/27/2020	2019	Line 21, Business loss of \$83,936
TWENTY-EIGHT	Above and Beyond Thinking, Inc. (T.C.)	03/15/2021	2020	Line 21, Business loss of \$104,542
TWENTY-NINE	Above and Beyond Thinking, Inc. (T.C.)	03/15/2022	2021	Line 21, Business loss of \$124,506

COUNT	BUSINESS (TAXPAYER)	APPROX. DATE FILED	TAX YEAR	FALSE ITEM
THIRTY	Going Coastal Inc. (D.F.)	04/15/2017	2016	Line 21, Business loss of \$36,711
THIRTY- ONE	Going Coastal Inc. (D.F.)	05/07/2018	2017	Line 21, Business loss of \$60,403
THIRTY- TWO	Going Coastal Inc. (D.F.)	05/18/2019	2018	Line 21, Business loss of \$51,082
THIRTY- THREE	Going Coastal Inc. (D.F.)	08/04/2020	2019	Line 21, Business loss of \$64,506
THIRTY- FOUR	Leatherneck Inc. (V.C.)	04/11/2017	2016	Line 21, Business loss of \$30,264
THIRTY- FIVE	Leatherneck Inc. (V.C.)	03/15/2018	2017	Line 21, Business loss of \$31,163
THIRTY- SIX	Leatherneck Inc. (V.C.)	03/15/2019	2018	Line 21, Business loss of \$50,306
THIRTY- SEVEN	PG Resources (A.P.)	03/15/2017	2016	Line 21, Business loss of \$53,417
THIRTY- EIGHT	PG Resources (A.P.)	04/03/2018	2017	Line 21, Business loss of \$68,986
THIRTY- NINE	PG Resources (A.P.)	03/15/2019	2018	Line 21, Business loss of \$54,761
FORTY	Soul Ride Corporation (J.H.)	03/15/2017	2016	Line 21, Business loss of \$33,901
FORTY- ONE	Soul Ride Corporation (J.H.)	03/15/2018	2017	Line 21, Business loss of \$33,300
FORTY- TWO	Soul Ride Corporation (J.H.)	03/15/2019	2018	Line 21, Business loss of \$50,955

COUNT	BUSINESS (TAXPAYER)	APPROX. DATE FILED	TAX YEAR	FALSE ITEM
FORTY-THREE	Soul Ride Corporation (J.H.)	03/15/2020	2019	Line 21, Business loss of \$58,382
FORTY-FOUR	Vienna and Associates Inc. (M.M.)	03/15/2017	2016	Line 21, Business loss of \$32,093
FORTY-FIVE	Vienna and Associates Inc. (M.M.)	03/15/2018	2017	Line 21, Business loss of \$46,792
FORTY-SIX	Vienna and Associates Inc. (M.M.)	03/15/2019	2018	Line 21, Business loss of \$34,221

COUNT	BUSINESS (TAXPAYER)	APPROX. DATE FILED	TAX YEAR	FALSE ITEM
FORTY- SEVEN	West Ridge Ventures Corp. (M.K.)	08/26/2021	2019	Line 21, Business loss of \$22,435

A TRUE BILL

  
Foreperson

E. MARTIN ESTRADA  
United States Attorney

  
Scott M. Garringer  
Deputy Chief, Criminal Division For:

MACK E. JENKINS  
Assistant United States Attorney  
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